

October 4, 2019

Beckman Coulter Biomedical GmbH Amanda Brown Manager Regulatory Affairs Sauerbruchstr. 50 Munich, 81377 Germany

Re: K190298

Trade/Device Name: Access Vitamin B12

Access Ferritin
Access Folate

Access TSH (3rd IS)

DxA 5000

DxI 800 Access Immunoassay System

Regulation Number: 21 CFR 862.1810 Regulation Name: Vitamin B12 Test System

Regulatory Class: Class II

Product Code: CDD, JMG, CGN, JLW, JJE

Dated: August 8, 2019 Received: August 21, 2019

## Dear Amanda Brown:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

K190298 - Amanda Brown Page 2

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801 and Part 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <a href="https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems">https://www.fda.gov/medical-device-problems</a>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</a>) and CDRH Learn (<a href="https://www.fda.gov/training-and-continuing-education/cdrh-learn">https://www.fda.gov/training-and-continuing-education/cdrh-learn</a>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</a>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Kellie B. Kelm, Ph.D.
Acting Director
Division of Chemistry and Toxicology Devices
OHT7: Office of In Vitro Diagnostics
and Radiological Health
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

# DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

# **Indications for Use**

Form Approved: OMB No. 0910-0120 Expiration Date: 06/30/2020

Expiration Date: 06/30/2020 See PRA Statement below.

510(k) Number *(if known)* k190298

**Device Name** 

DxA 5000, DxI 800 Access Immunoassay System, Access Ferritin Access Folate, Access TSH (3rd IS), Access Vitamin B12

Indications for Use (Describe)

The DxA 5000 is a high-speed, modular, automated sample handling system that performs pre-analytical and post-analytical sample processing and storage. The automation system also sorts, routes, and presents sample tubes to analyzers for analysis. The DxA 5000 also consolidates a variety of analytical instruments, such as an Immunoassay analyzer, into a unified workstation on a track system.

The DxI 800 Access Immunoassay System is a microcomputer controlled, random and continuous access analyzer that includes an external computer. This computer stores the system user interface (UI) software and allows the operator to interface with and direct the instrument software. The UniCel DxI 800 System uses enzyme immunoassays (utilizing paramagnetic particle solid phase and chemiluminescent detection) for the quantitative, semi-quantitative or qualitative determination of various analyte concentrations found in human body fluids. The UniCel DxI 800 System is an in vitro diagnostic device for use in the clinical laboratory.

The Access Ferritin assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of ferritin levels in human serum and plasma (heparin) using the Access Immunoassay Systems. Measurements of ferritin aid in the diagnosis of diseases affecting iron metabolism.

The Access Folate assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of folic acid levels in human serum and plasma (heparin) or red blood cells using the Access Immunoassay Systems. Folate levels in serum and plasma (heparin) or red blood cells are used to assess folate status. The serum folate level is an indicator of recent folate intake. A low RBC folate value can indicate a prolonged folate deficiency. Folic acid measurements are used in the diagnosis and treatment of megaloblastic anemia.

The Access TSH (3rd IS) assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of human thyroid-stimulating hormone (thyrotropin, TSH, hTSH) levels in human serum and plasma using the Access Immunoassay Systems. This assay is capable of providing 3rd generation TSH results. Measurements of thyroid stimulating hormone produced by the anterior pituitary are used in the diagnosis of thyroid or pituitary disorders.

The Access Vitamin B12 assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of vitamin B12 levels in human serum and plasma (heparin) using the Access Immunoassay Systems. Measurements obtained by this device are used in the diagnosis and treatment of anemias of gastrointestinal malabsorption.

CONTINUE ON A SEPARATE PAGE IF NEEDED.		
Prescription Use (Part 21 CFR 801 Subpart D)	Over-The-Counter Use (21 CFR 801 Subpart C)	
Type of Use (Select one or both, as applicable)		
Measurements obtained by this device are used in the diagnosis malabsorption.	and treatment of anemias of gastrointestinal	

This section applies only to requirements of the Paperwork Reduction Act of 1995.

#### \*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\*

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRAStaff@fda.hhs.gov

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."



## 1.0 Submitted By:

Amanda Brown, RAC Manager Regulatory Affairs Beckman Coulter Biomedical GmbH Sauerbruchstr. 50 81377 Munich Germany

Telephone: +49 (0) 89 579589-3611 Email: abrown2@beckman.com

#### 2.0 Date Submitted:

February 8, 2019

## 3.0 Device Name(s):

# 3.1 **Proprietary Names**

DxA 5000

DxI 800 Access Immunoassay System Access Ferritin Access Folate Access TSH (3<sup>rd</sup> IS) Access Vitamin B12

## 3.2 Common Name

**Laboratory Automation System** 

#### 3.2 Classification Name

Name	Regulation	Product	Device	Review
	Number	Code	Class	Panel
Discrete photometric chemistry	862.2160	JJE	l	Clinical
analyzer for clinical use				Chemistry
Ferritin immunological test	866.5340	JMG	II	Clinical
system				Chemistry
Folic acid test system	862.1295	CGN	II	Clinical
				Chemistry
Thyroid stimulating hormone	862.1690	JLW	II	Clinical
test system				Chemistry
B12 test system	862.1810	CDD	II	Clinical
				Chemistry



#### 4.0 Legally Marketed Device

Candidate(s)	Predicate	Manufacturer	Document Number
DxA 5000	Power Processor Sample	Beckman Coulter,	K110413
	Processing System	Inc.	

#### 5.0 Device Description

The DxA system is a high throughput automated sample handling system which can perform the pre and post analytical processing of sample tubes. DxA can identify and track samples, perform centrifugation, decapping, delivery of samples to connected analyzers, recapping, storing in either non-refrigerated or refrigerated storage, and sorting to output racks.

The DxA integrates perianalytic (pre and post analysis) functions with analytical instruments (Beckman Coulter, and other manufacturer's) via a track system to provide fully integrated testing solutions.

#### 6.0 Intended Use

The DxA 5000 is a high-speed, modular, automated sample handling system that performs preanalytical and post-analytical sample processing and storage. The automation system also sorts, routes, and presents sample tubes to analyzers for analysis. The DxA 5000 also consolidates a variety of analytical instruments, such as an Immunoassay analyzer, into a unified workstation on a track system.

#### 7.0 Indications for Use

The DxA 5000 is a high-speed, modular, automated sample handling system that performs preanalytical and post-analytical sample processing and storage. The automation system also sorts, routes, and presents sample tubes to analyzers for analysis. The DxA 5000 also consolidates a variety of analytical instruments, such as an Immunoassay analyzer, into a unified workstation on a track system.



The UniCel DxI 800 Access Immunoassay System is a microcomputer controlled, random and continuous access analyzer that includes an external computer. This computer stores the system user interface (UI) software and allows the operator to interface with and direct the instrument software. The UniCel DxI 800 System uses enzyme immunoassays (utilizing paramagnetic particle solid phase and chemiluminescent detection) for the quantitative, semi-quantitative or qualitative determination of various analyte concentrations found in human body fluids. The UniCel DxI 800 System is an in vitro diagnostic device for use in the clinical laboratory.

The Access Ferritin assay is a paramagnetic particle, chemiluminescent assay for the quantitative determination of ferritin levels in human serum and plasma (heparin) using the Access Immunoassay Systems. Measurements of ferritin aid in the diagnosis of diseases affecting iron metabolism.

The Access Folate assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of folic acid levels in human serum, plasma (heparin) and red blood cells using the Access Immunoassay Systems. Folic acid measurements are used in the diagnosis and treatment of megaloblastic anemia.

The Access TSH (3rd IS) assay is a paramagnetic particle, chemiluminescent assay for the quantitative determination of human thyroidstimulating hormone (thyrotropin, TSH, hTSH) levels in human serum using the Access Immunoassay Systems. Measurements of thyroid stimulating hormone produced by the anterior pituitary are used in the diagnosis of thyroid or pituitary disorders.

The Access Vitamin B12 assay is a paramagnetic particle, chemiluminescent assay for the quantitative determination of vitamin B12 in human serum and plasma (heparin) using Access Immunoassay Systems. Measurements obtained by this device are used in the diagnosis and treatment of anemias of gastrointestinal malabsorption.



## **Comparison to the Predicate**

#### **Predicate Device Name and 510k information:**

Power Processor Sample Processing System (k110413)

Beckman Coulter UniCel® Dxl 800 Access® Immunoassay System (k023764)

Beckman Coulter Access® Ferritin assay (k926221)

Beckman Coulter Access® Folate assay (k060774)

Beckman Coulter Access® HYPER sensitive hTSH assay (k042281)

Beckman Coulter Access® Vitamin B12 assay (k955436)

The DxA 5000 has the following similarities to the previously cleared Power Processor Sample Processing System (K110413).

Characteristic	Power Processor	DxA 5000
Intended Use	The basic Power Processor is an automated sample handling system which processes sample tubes from the pre-centrifugation, pre-sorting step to presentation of centrifuged and decapped samples into Generic or Personality Racks for specific instruments. The Power Processor can be configured with optional software and hardware to allow processing of sample tubes on Generic Connection Instruments. The Power Processor performs all pre-analytical sample tube preparation, and then sorts the sample tubes directly to Generic Connection Modules where the samples are pipetted by the Generic Connection instrument for testing. After the samples are pipetted, the tubes can route to other instruments for additional testing or to Outlet Racks.	The DxA 5000 is a high-speed, modular, automated sample handling system that performs pre-analytical and post-analytical sample processing and storage. The automation system also sorts, routes, and presents sample tubes to analyzers for analysis. The DxA 5000 also consolidates a variety of analytical instruments, such as an Immunoassay analyzer, into a unified workstation on a track system.





	T =	
System Design	Open LAS architecture enables multiple analyzer connections,	Same
	including 3rd party systems.	
	Scalable, modular configuration.	
Fundamental	Centralized operation and	Same
Technology	monitoring of decentralized	
	equipment.	
Sample Transfer	Onboard sampling is the physical	Same
Method	transfer of the sample tube/rack	
	from the automation track to the	
	analyzer's sample load and	
	identification area.	
	Outboard sampling capability reads	
	the barcode for the analyzer and	
	signals the analyzer's existing LAS	
	communications interface to	
	perform direct track sampling.	
Host	The ability to interface with a	The ability to interface with a
Communications	Laboratory Information System (LIS)	Laboratory Information
	device to receive patient	System (LIS) device via
	identification and test requests via	Remisol to receive patient
	a communications protocol to	identification and test
	provide sample tracking via bar	requests (based on bar code
	code labeling.	labeling) and to provide
	_	sample tracking via a
		communications protocol.
Operating	Operating Software Microsoft	Main Console: Microsoft
Environment	Windows XP, Computer Console	Windows embedded Standard
	with Single User Interface.	7 (64-Bit) with one user
		interface per system.
		Module Consoles: Microsoft
		Windows embedded Standard
		7 (32-Bit) with one user
		interface per module.
Sample	Identification of patient tubes and	Same
Identification	sample programming using bar	
	codes.	
Control panel	Buttons and 2 character display	Touch screen based control on
		each module console
Racks per Inlet	4 racks that hold 50 tubes each	36 tubes per rack, 4 racks per
		drawer, 3 drawers





	1	
Immunoassay	Unicel DxI 800 Access Immunoassay	Same
Analyzer	System	
Connection		
Assay	Access Ferritin Assay	Same
Performance	Access Folate Assay	
	Access HYPERsensitive hTSH Assay	
	Access Vitamin B12 Assay	
Throughput	450 tubes per hour (with 2	Up 1200 tubes per hour
	centrifuges).	
Sample	Primary and secondary Tubes	Same
Containers		
Aliquotter	Yes	No
Centrifugation	Tube sizes must be all the same.	Can support multiple tube
		sizes
De-capping	Yes	Same
Sample	Barcode	Same
Identification		
Sample Storage	Yes	Same
Volume	Yes- (Combination of infrared	Yes- (Laser- Liquid Level
Detection	sensor and pressure sensor)	Detection)

Characteristic	Power Processor connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System	DxA 5000 connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System
DxI 800	The UniCel DxI 800 Access	The UniCel DxI 800 Access
Indications for	Immunoassay System with	Immunoassay System is a
Use	laboratory automation connection	microcomputer controlled,
	is a microcomputer-controlled,	random and continuous access
	random and continuous access	analyzer that includes an
	analyzer that includes an external	external computer. This
	computer. This computer stores	computer stores the system
	the system user interface (UI)	user interface (UI) software
	software and allows the operator	and allows the operator to
	to interface with and direct the	interface with and direct the
	instrument software. The UniCel	instrument software. The
	DxI 800 System uses enzyme	UniCel Dxl 800 System uses
	immunoassays (utilizing	enzyme immunoassays
	paramagnetic particle solid phase	(utilizing paramagnetic
	and chemiluminescent detection)	particle solid phase and





	for determination of various analytes, such as Vitamin B12, Ferritin, Folate and hTSH along with other various enzyme immunoassays assays that may be adaptable to the analyzer depending on the reagent used to induce the enzyme immunoassay reaction. The UniCel DxI 800 System is an in vitro diagnostic device for use in the clinical laboratory.	chemiluminescent detection) for the quantitative, semi- quantitative or qualitative determination of various analyte concentrations found in human body fluids. The UniCel DxI 800 System is an in vitro diagnostic device for use in the clinical laboratory.
Main Automation Connection Software Sample Identification	Prep Link software  Barcode	Remisol software  Same

Characteristic	Power Processor connected to Beckman Coulter UniCel® Dxl 800 Access® Immunoassay System with Ferritin assay	DxA 5000 connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System with Ferritin assay
Beckman Coulter Access® Ferritin assay Indications for Use	The Access Ferritin assay is a paramagnetic particle, chemiluminescent assay for the quantitative determination of ferritin levels in human serum and plasma (heparin) using the Access Immunoassay Systems.  Measurements of ferritin aid in the diagnosis of diseases affecting iron metabolism.	The Access Ferritin assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of ferritin levels in human serum and plasma (heparin) using the Access Immunoassay Systems.
Sample Identification	Barcode	Same



Characteristic	Power Processor connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System with Folate assay	DxA 5000 connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System with Folate assay
Beckman Coulter Access® Folate assay Indications for Use	The Access Folate assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of folic acid levels in human serum, plasma (heparin) and red blood cells using the Access Immunoassay Systems. Folic acid measurements are used in the diagnosis and treatment of megaloblastic anemia.	The Access Folate assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of folic acid levels in human serum and plasma (heparin) or red blood cells using the Access Immunoassay Systems. Folate levels in serum and plasma (heparin) or red blood cells are used to assess folate status. The serum folate level is an indicator of recent folate intake. A low RBC folate value can indicate a prolonged folate deficiency.
Sample Identification	Barcode	Same

Characteristic	Power Processor connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System with hTSH assay	DxA 5000 connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System with hTSH assay
Beckman Coulter	The Access HYPER sensitive hTSH	The Access TSH (3rd IS) assay
Access® hTSH	assay is a paramagnetic particle,	is a paramagnetic particle,
assay Indications	chemiluminescent assay for the	chemiluminescent
for Use	quantitative determination of	immunoassay for the
	human thyroid-stimulating	quantitative determination of
	hormone (thyrotropin, hTSH) levels	human thyroid-stimulating
	in human serum using the Access	hormone (thyrotropin, TSH,
	Immunoassay Systems.	hTSH) levels in human serum
	Measurements of thyroid	and plasma using the Access
	stimulating hormone produced by	Immunoassay Systems. This



	the anterior pituitary are used in the diagnosis of thyroid or pituitary disorders.	assay is capable of providing 3rd generation TSH results.
Sample Identification	Barcode	Same

Characteristic	Power Processor connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System with B12 assay	DxA 5000 connected to Beckman Coulter UniCel® DxI 800 Access® Immunoassay System with B12 assay
Beckman Coulter Access® B12 assay Indications for Use	The Access Vitamin B12 assay is a paramagnetic particle, chemiluminescent assay for the quantitative determination of vitamin B12 in human serum and plasma (heparin) using Access Immunoassay Systems.  Measurements obtained by this device are used in the diagnosis and treatment of anemias of gastrointestinal malabsorption.	The Access Vitamin B12 assay is a paramagnetic particle, chemiluminescent immunoassay for the quantitative determination of vitamin B12 levels in human serum and plasma (heparin) using the Access Immunoassay Systems.
Sample Identification	Barcode	Same

## 8.0 Summary of Performance Data

The acceptance criteria were met for all method comparisons thereby demonstrating the following:

- Equivalence between the predicate lab automation system Power Processor and the candidate one, DxA 5000 in terms of the DTS barcode identification process.
- Equivalence between the predicate lab automation system Power Processor and the candidate one, DxA 5000 in terms of pre-analytical processing.





A method comparison study was performed utilizing CLSI EP09 for the following assays; TSH (3rd IS) Ferritin, Folate and B12. For all method comparisons, results were within the specifications when the candidate was compared to the predicate.

The above referenced assays are representative of the assay methodologies available for use with the connected system, however performance is not limited to use with these assays.

Performance data from testing shows that all software design, development and verification activities have been completed, and supports a finding of substantial equivalency of DxA 5000 to the Power Processor Sample Processing System.